

UNITED STATES OF AMERICA  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

First-Class Package Service (FCPS)  
Service Standard Changes, 2021

Docket No. N2021-2

PRESIDING OFFICER'S INFORMATION REQUEST NO. 13

(Issued August 13, 2021)

Pursuant to Order No. 5920<sup>1</sup> and 39 C.F.R. §§ 3020.117 and 3020.118, the Postal Service is requested to respond to the following questions to clarify the record on its request for an advisory opinion under 39 U.S.C. § 3661(c) regarding First-Class Package Service (FCPS) Service Standard Changes.<sup>2</sup> To facilitate the inclusion of the requested material in the evidentiary record, the Postal Service shall have a witness attest to the accuracy of the answers. For each question, produce every document (including any calculations, analysis, assumptions, studies, or workpapers) used, relied upon, or referenced in preparing the response. Responses shall be provided as soon as they are available, but no later than August 20, 2021.

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<sup>1</sup> Notice and Order on the Postal Service's Request for an Advisory Opinion on Changes in the Nature of Postal Services, June 21, 2021 (Order No. 5920).

<sup>2</sup> United States Postal Service Request for an Advisory Opinion on Changes in the Nature of Postal Services, June 17, 2021 (Request).

**The following questions refer to witness Hagenstein's testimony (USPS-T-1):<sup>3</sup>**

1. Please refer to the Postal Service's Request at 10, stating, "For those customers who need faster delivery than would be provided under these standards, Priority Mail Express and Priority Mail – products within the Postal Service's overall package portfolio that offer a different balance of speed and cost -- would continue to be available."
  - a. Please confirm that the current rules to assign Priority Mail volume to the air versus the surface network are the same as the assignment rules for FCPS.
  - b. If part a. of this question is not confirmed, please describe how the current rules to assign Priority Mail volume to the air versus the surface network differ from the rules for FCPS.
  - c. Please confirm that the current critical entry times (CETs) for Priority Mail are the same as for FCPS.
  - d. If part c. of this question is not confirmed, please describe how the CETs for Priority Mail differ from the CETs for FCPS.
2. Please refer to the response to Presiding Officer's Information Request No. 7, question 1, in which the Postal Service provides non-public data estimating the proposal's impact based on applying percentages of urban and rural delivery points to the volumes originating from and/or destined to each 3-digit ZIP area.<sup>4</sup>

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<sup>3</sup> Direct Testimony of Stephen B. Hagenstein on Behalf of the United States Postal Service (USPS-T-1), June 17, 2021; see *also* Notice of Filing Replacement Direct Testimony of Stephen B. Hagenstein on Behalf of the United States Postal Service (USPS-T-1), June 21, 2021; Notice of the United States Postal Service of Revisions to Certain Pages of the Request for an Advisory Opinion, USPS-T-1, USPS-T-2, and USPS-T-3 -- Errata, July 2, 2021 (Errata to Request and Testimony).

<sup>4</sup> Responses of the United States Postal Service to Questions 1-5 of Presiding Officer's Information Request No. 7, July 29, 2021, question 1 (Response to POIR No. 7).

Did the Postal Service implement any changes to its proposal based on these data?

- a. If so, please provide details of those changes.
- b. If not, please explain why.

**The following question refers to witness Foti's testimony (USPS-T-3):<sup>5</sup>**

- 3. Please refer to the response to SH/USPS-T3-2, stating that "[f]urther, to the extent that the Postal Service maintains goals for competitive products that include FCPS, the Postal Service files information regarding competitive products with the Postal Regulatory Commission as part of its nonpublic Annual Performance Plan and Performance Report."<sup>6</sup> Please provide a public response to the following question. Does the Postal Service intend to provide non-public service performance results and targets that isolate FCPS along with the Postal Service's filing of the FY 2021 *Annual Compliance Report* and the Postal Service's FY 2021 Annual Performance Report and FY 2022 Annual Performance Plan, or does the Postal Service intend to provide only composite service performance results and targets that aggregate multiple competitive products?

Ann C. Fisher  
Presiding Officer

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<sup>5</sup> Direct Testimony of Thomas J. Foti on Behalf of the United States Postal Service (USPS-T-3), June 17, 2021; Errata to Request and Testimony.

<sup>6</sup> Responses of United States Postal Service Witness Foti to Intervenor Steve Hutkins' Interrogatories (SH/USPS-T3-1-5), July 28, 2021.